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7 Attorneys for Defendant, COUNTY OF SAN BERNARDINO,  
8 ROBERT VACCARI, and JAKE ADAMS

9  
10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 L.C., a minor by and through her  
13 guardian *ad litem* Maria Cadena,  
individually and as successor-in-interest  
to Hector Puga; I.H., a minor by and  
through his guardian *ad litem* Jasmine  
Hernandez, individually and as  
successor-in-interest to Hector Puga;  
A.L., a minor by and through her  
guardian *ad litem* Lydia Lopez,  
individually and as successor-in-interest  
to Hector Puga; and ANTONIA  
SALAS UBALDO, individually,

14 Plaintiffs,

15 vs.

16 STATE OF CALIFORNIA; COUNTY  
17 OF SAN BERNARDINO; S.S.C., a  
nominal defendant; ISAIAH KEE;  
MICHAEL BLACKWOOD;  
18 BERNARDO RUBALCAVA;  
ROBERT VACCARI; JAKE ADAMS;  
and DOES 6-10, inclusive,

19 Defendants.

20 CASE NO. 5:22-cv-00949-KK-(SHKx)  
21 *Assigned for All Purposes to:  
Hon. Kenly K. Kato – Courtroom 3*

22 **COUNTY DEFENDANTS' NOTICE  
OF NON-OPPOSITION  
PLAINTIFFS' EX PARTE  
APPLICATION FOR APPROVAL  
OF COMPROMISE OF THE  
MINOR PLAINTIFFS AND  
NOMINAL DEFENDANT'S  
CLAIMS**

23 *Trial Date: June 2, 2025*

24 *Complaint filed: 06/07/2022  
FAC filed: 10/18/22  
SAC filed: 01/13/23  
TAC filed: 05/12/23*

1 **TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:**

2 Defendants, COUNTY OF SAN BERNARDINO, ROBERT VACCARI, and  
3 JAKE ADAMS (collectively, “County Defendants”) have reviewed Plaintiffs’ *Ex*  
4 *Parte* Application for Approval of Compromise of the Minor Plaintiffs and Nominal  
5 Defendant’s Claims submitted to this Court. (Dkt #198 and 198-12)

6 County Defendants have no opposition to Plaintiffs’ *Ex Parte* Application for  
7 Approval of Compromise of the Minor Plaintiffs and Nominal Defendant’s Claims.

8  
9 DATED: July 21, 2025

**LYNBERG & WATKINS**  
A Professional Corporation

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12 By: /s/ Shannon L. Gustafson  
13 **SHANNON L. GUSTAFSON**  
14 **AMY R. MARGOLIES**  
15 Attorneys for Defendant,  
16 COUNTY OF SAN BERNARDINO  
17 ROBERT VACCARI, and JAKE ADAMS